

# **EXHIBIT L**



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**By Electronic Mail**

Benjamin P. McCallen  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, NY 10019-6099

Re: *BSGR v. Soros et al.*

Dear Ben:

You will be receiving an email with a link and a password for documents numbered BSGRSOR00017685-BSGRSOR00018581. These documents are being produced pursuant to the protective order in this action, and in accordance with Judge Wang's April 7 order.

As you know, BSGR is in administration and has recently changed administrators. As it has been explained to us, and I believe as counsel at Katten may have more information on, the new administrators have faced a series of challenges getting access to documents and information for production. Thus, this production reflects those documents that BSGR in good faith and after much effort has in its possession at the time of production. We have been and are continuing to take steps to obtain the relevant information and documents. BSGR will supplement this production if and when it receives additional responsive documents.

Finally, as we have explained, LCIA Procedural Order 2 (part of the production) restricts production of the LCIA witness statements. They also reference Swiss and Guinean law that limit production of information about investigations. Similarly, various ICSID procedural orders (e.g., Numbers 2, 4, 6, 8, 10, 12, 13, 16 and 19 – also in the production) limit production of certain ICSID witness statements, information and documents. At this time, we are not producing witness statements in our possession that we believe are covered by these orders. We are prepared to meet and confer about these orders as directed by the Court (Issue 6). And though we think the orders are self-explanatory, we are willing to try to answer any questions you have.

Sincerely,

Louis M. Solomon